



April 2, 2025

VIA ECF

Honorable Mary Kay Vyskocil
United States District Court
Southern District of New York
500 Pearl Street, Room 2230
New York, NY 10007

Re: *American Association of University Professors et al. v. U.S. Department of Justice et al.*, Case No. 1:25-cv-02429

Dear Judge Vyskocil:

We represent the Plaintiffs in the above-referenced case. Plaintiffs intend to file a motion for a preliminary injunction tomorrow, Thursday, April 3, 2025, along with a memorandum of law in support of the motion. We write respectfully to request an enlargement of the word and page count limitations for supporting memoranda, as set forth in Local Civil Rule 7.1(c) and this Court's individual rules of practice in civil cases. In total, Plaintiffs seek leave to file a memorandum of law that does not exceed 35 pages or 12,250 words.

Plaintiffs intend to be as efficient as possible in presenting their arguments but request the enlargement in order to fully address the legal and factual issues raised by their motion. Plaintiffs intend to seek relief based on claims arising under the Administrative Procedure Act and several provisions of the Constitution and to demonstrate their likelihood of success on each of these legal claims. In addition, in light of the standard for granting injunctive relief, Plaintiffs intend to describe extensive factual evidence demonstrating the harms that Defendants' actions have caused Plaintiffs and their members to experience. Additional space is necessary to ensure that Plaintiffs can adequately address these issues.

Counsel for all Defendants has indicated that Defendants do not oppose Plaintiffs' request for an enlargement. Defendants' counsel has agreed to accept electronic service of pleadings in this matter, and Plaintiffs have electronically served this letter motion on Defendants' counsel.

Respectfully submitted,

S/ Orion Danjuma

Orion Danjuma

Rachel Goodman

Deana K. El-Mallawany*

The Protect Democracy Project, Inc.



82 Nassau Street, #601
New York, NY 10038
Tel: (202) 579-4582
Fax: (202) 769-3176
orion.danjuma@protectdemocracy.org
rachel.goodman@protectdemocracy.org
deana.elmallawany@protectdemocracy.org

Anna Dorman*
Catherine Chen*
Amit Agarwal*
The Protect Democracy Project, Inc.
2020 Pennsylvania Ave. NW, Suite #163
Washington, D.C. 20006
Tel: (202) 579-4582
Fax: (202) 769-3176
anna.dorman@protectdemocracy.org
catherine.chen@protectdemocracy.org
amit.agarwal@protectdemocracy.org

Eve H. Cervantez*
Stacey M. Leyton*
Matthew J. Murray*
Connie K. Chan*
Juhyung Harold Lee*
Jonathan Rosenthal*
ALTSHULER BERZON LLP
177 Post St., Suite 300
San Francisco, CA 94108
Tel: (415) 421-7151
Fax (415) 362-8064
ecervantez@altber.com
sleyton@altber.com
mmurray@altber.com
cchan@altber.com
hlee@altber.com
jrosenthal@altber.com

Richard Primus*
The University of Michigan Law School
(institutional affiliation provided for identification
purposes only; not representing the University)
625 S. State Street



Ann Arbor, MI 48109
Tel: (734) 647-5543
Fax: (734) 764-8309
PrimusLaw1859@gmail.com

**Pro hac vice* application granted, pending, or
forthcoming

Counsel for Plaintiffs